

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	
)	Chapter 11
JOANN INC., <i>et al.</i> , ¹)	
)	Case No. 25-10068 (CTG)
)	
Debtors.)	(Jointly Administered)
)	
)	Re: Docket No. 1077

**CERTIFICATION OF COUNSEL REGARDING NINETEENTH NOTICE OF
ASSUMPTION AND ASSIGNMENT OF CERTAIN EXECUTORY
CONTRACTS AND/OR UNEXPIRED LEASES RELATING TO
B33 BANDERA POINTE II LLC**

The undersigned counsel to JOANN Inc. and certain of its affiliates, the debtors and debtors in possession in the above-captioned cases (collectively, the “Debtors”), hereby certifies as follows:

1. On June 5, 2025, the Debtors filed the *Nineteenth Notice of Assumption and Assignment of Certain Executory Contracts and/or Unexpired Leases* [Docket No. 1077] (the “Assumption Notice”) regarding the assumption and assignment of certain unexpired leases set forth in the Assumption Notice. Attached to the Assumption Notice was a proposed form of order (the “Assumption Order”) authorizing the assumption and assignment of certain leases.

2. The deadline to object to the Assumption Notice was June 19, 2025 (the “Objection Deadline”). Prior to the Objection Deadline, the Debtors received informal comments to the Assumption Notice from B33 Bandera Pointe II LLC (“Bandera”).

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors’ mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

3. Bandera agreed to revise the proposed cure amounts listed in the Assumption Notice pursuant to an agreement between Bandera and the proposed assignee, Michaels Stores, Inc. (“Michaels”).

4. Attached hereto as **Exhibit A** is a revised proposed order (the “Revised Assumption Order”) assigning the Bandera lease listed on the Assumption Notice to Michaels. A redline comparing the Revised Assumption Order to the Assumption Order is attached hereto as **Exhibit B**.

5. Accordingly, the Debtors request entry of the Revised Assumption Order attached hereto as **Exhibit A** at the Court’s earliest convenience.

[Remainder of page intentionally left blank.]

Dated: June 26, 2025
Wilmington, Delaware

/s/ Jack M. Dougherty

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